UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

In re)	Chapter 9
CITY OF DETROIT, MICHIGAN,)	Case No. 13-53846
)	Hon. Steven W. Rhodes
)	

AMERICAN FEDERATION OF STATE, COUNTY AND MUNICIPAL EMPLOYEES COUNCIL 25 (AFSCME) LIST OF FACT WITNESSES

Michigan AFSCME Council 25, by and through its counsel, files this list of fact witnesses for the Court's confirmation hearing:

1. Necessary Rebuttal Witnesses – AFSCME does not anticipate the need to call witnesses at this time. However, it reserves the right to examine any witnesses called, and to call any rebuttal witnesses it deems necessary.

AFSCME reserves the right to supplement or modify this list, as a result of information received in discovery or otherwise.

Dated: August 1, 2014

/s/ Richard G. Mack, Jr.

Richard G. Mack, Jr., Esq. MILLER COHEN PLC 600 West Lafayette Boulevard, 4th Floor

Detroit, MI 48226-3191 Telephone: (313) 964-4454 Facsimile: (313) 964-4490

richardmack@millercohen.com

Sharon L. Levine
Philip J. Gross
LOWENSTEIN SANDLER LLP
65 Livingston Avenue Roseland, New
Jersey 07068
T. L. Levine (072) 507-2500

Telephone: (973) 597-2500 Facsimile: (973) 597-6247 slevine@lowenstein.com pgross@lowenstein.com

Herbert A. Sanders
THE SANDERS LAW FIRM PC
615 Griswold St., Suite 913
Detroit, MI 48226

Telephone: (313) 962-0099 Facsimile: (313) 962-0044 hsanders@miafscme.org

Counsel to Michigan Council 25 of the American Federation of State, County and Municipal Employees (AFSCME), AFL-CIO

UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF MICHIGAN **SOUTHERN DIVISION**

In re)	Chapter 9
CITY OF DETROIT, MICHIGAN,)	Case No. 13-53846
)	Hon. Steven W. Rhodes
)	

PROOF OF SERVICE

The undersigned certifies that on August 1, 2014, the American Federation of State, County and Municipal Employees Council 25 (AFSCME) filed List of Fact Witnesses was electronically filed with the Clerk of the Court for the United States Bankruptcy Court, Eastern District of Michigan, Southern Division using the CM/ECF System, which will send notification of such filing to all attorneys and parties of record registered electronically.

> /s/ Richard G. Mack, Jr. Richard G. Mack, Jr., Esq. MILLER COHEN PLC 600 West Lafayette Boulevard, 4th Floor Detroit, MI 48226-3191 Telephone: (313) 566-4787

Facsimile: (313) 964-4490 richardmack@millercohen.com